

ALCOHOL AND DRUG TESTING STANDARD

March 20, 2013

SCOPE AND PURPOSE

Geocomp is committed to providing a safe work environment for its Employees and for those whose safety may be affected by its Employees. Geocomp recognizes that the use of Alcohol and Drugs can adversely impact a safe work environment. The Alcohol and Drug Policy, this Alcohol and Drug Testing Standard (the "Standard"), and other Supporting Standards including Site Specific Standards are aimed at ensuring a safe work environment and outline specific responsibilities, requirements and expectations to adequately mitigate the workplace risks associated with Alcohol and Drugs.

The purpose of this Standard is to address and minimize the risks in the workplace associated with Alcohol and Drugs and to ensure that all Employees are Fit-for-Duty. This Standard is only one facet of an overall approach to risk mitigation and safety.

GUIDANCE & STANDARDS

This Standard applies to Geocomp. It applies to all Geocomp Employees. In addition to the obligations set out in this Standard, all Employees must comply with any additional Site Specific Standards.

Employees are subject to the following types of Alcohol and Drug testing:

- post-incident
- reasonable cause
- return to duty – post violation
- return to duty – post treatment
- certification (only Employees in Safety-Sensitive Positions)

Additional forms of Alcohol and Drug testing may be required on a site-specific basis.

1. POST-INCIDENT

Alcohol and Drug testing may be required after a serious or potentially serious work-related incident as part of a full investigation into the circumstances. The decision to refer an Employee for a test will be made by the Leader investigating the incident after appropriate consultation and the reasons for testing will be documented as soon as possible after action has taken place.

A serious incident would be one that resulted in:

- a fatality;
- a serious personal injury to a worker (medical treatment or worse), a member of the public or any other individual;
- an incident with a potential for serious injury to a worker (medical treatment or worse), a member of the public or any other individual;
- an environmental incident or a potential environmental incident with significant consequences;
- a significant or a potential significant loss or damage to property or Equipment; or
- a significant or a potential significant loss of Company revenues or the payment of damages.

In addition to the incidents listed above, at their discretion and as part of a complete investigation, a Leader may require a post-incident test after any other serious work incident or an incident without loss considered to have had potential for more serious consequences.

Testing will be required as part of an investigation into a less serious incident if, as a result of the preliminary review, it is reasonably believed that Alcohol or Drug use may have been a factor.

Reporting of an incident:

- all incidents must be reported to an Employee's Leader immediately;
- failure to report an incident is a violation of this Policy; and
- Employees shall participate fully in any subsequent investigation as requested.
- The following applies to post-incident testing:
 - the decision to test an Employee must be made as soon as possible after the incident;
 - arrangements for testing should be made as soon as possible unless this is impossible because medical attention is required;
 - the need for a test must be documented as part of the preliminary investigation as soon as practical after the incident;
 - a test will be necessary if there is no credible explanation for the incident or near miss or potentially dangerous situation;
- Employees referred for a test will only be those who are identified, with reasonable cause, as having been directly involved in the chain of acts or omissions leading up to the event;
- Employees who are to be tested must, in compliance with the Alcohol and Drug Policy, refrain from using Alcohol or Drugs (other than Medications used in accordance with the Medication Standard) after being involved in or observing an incident until the earlier of (i) the Employee has been tested, or (ii) the Employee has been advised by the Company that they will not be tested, or (iii) 32 hours have elapsed since the incident; and
- Employees tested in this circumstance will be removed from duty until the investigation is complete.

2. REASONABLE CAUSE

The Company may require a test whenever there is reason to believe that the actions, appearance or conduct of an Employee indicate the use of Alcohol or Drugs. The reasons for testing will be documented as soon as practicable after the action has taken place. The referral for a test will be based on specific information or observations resulting from, but not limited to, indicators such as:

- observed use or evidence of use of a substance (e.g., smell of Alcohol or Drug);
- erratic, disruptive or atypical behavior or changes in behavior of the Employee;
- illogical responses to questions or instructions;
- changes in the physical appearance or speech patterns of the Employee;
- the presence of Alcohol, Drugs or Drug Paraphernalia in the vicinity of the Employee or the Company Premises where the Employee was present; and
- any other observations that suggest Alcohol or Drug use may be a factor (e.g., sleeping on the job).
- Employees tested in this circumstance will be removed from duty until the investigation is complete.

3. TIMEFRAME FOR TESTING FOR REASONABLE CAUSE AND POST-INCIDENT

- In a reasonable cause and post-incident testing situation, specimens for testing will be collected as soon as possible after the decision to test is made.

- For Alcohol testing, attempts to collect specimens will cease no later than 8 hours after the triggering event.
- For Drug testing, attempts to collect specimens will cease no later than 32 hours after the triggering event.

4. CUT-OFF LEVELS FOR ALCOHOL TESTING

- A positive Alcohol test result is at or above .04 BAC.
- If an Employee is subject to an unannounced testing program on return to duty after an Alcohol and Drug Policy violation or treatment, a positive test result is .02 BAC or more.
- Subject to above, an Employee who holds a Safety-Sensitive Position or Specified Position and has an Alcohol test result of .02 to .039 BAC will be removed from duty until considered safe to return by their Leader.

5. LABORATORY ANALYSIS

- All laboratory testing will be conducted by a fully qualified and accredited laboratory.
- A laboratory confirmed non-negative Drug test remains non-negative until confirmed by the Medical Review Officer as deemed positive.
- A laboratory confirmed positive Drug test is one in which the amount of Drug or drug metabolite in the specimen identified by the confirmation test is at or exceeds the established cut-off levels for the program which are outlined in the chart below. The below cut-off levels and panel of Drugs may be amended as necessary from time to time. The levels set out below represent levels at or above which the specimen will be reported as positive by the laboratory to the Medical Review Officer for further assessment.

Drug		Confirmation Test Levels
Urinalysis (ng/mL)*		
Marijuana (THC)		15
Cocaine		100
Cocaine		
Benzoylecgonine		
Opiates		
Morphine		2000
Codeine		2000
Oxy Contin		300
Hydrocodone		300
Hydromorphone		300
6-acetylmorphine		10
Phencyclidine (PCP)		25
Amphetamines		
Amphetamine		
Amine		250
Methamphetamine		250

6. RETURN TO POST DUTY - POST VIOLATION

In those situations where employment is continued after a Policy or Standard violation, Employees will be required to pass a return to duty test and may be subject to unannounced follow-up testing as a condition of continued employment as set out in an agreement with the Company.

7. LABORATORY RETURN TO DUTY – POST TREATMENT

In those situations where employment is continued after treatment has been completed Employees will be required to pass a return to duty test and may be subject to unannounced follow-up testing as a condition of continued employment as set out in an agreement with the Company.

8. CERTIFICATION

The certification process applies to (i) candidates who have been offered employment in a Safety-Sensitive Position, (ii) any Employee who is not currently in a Safety Sensitive Position that is moving into a Safety Sensitive Position, including as a result of a promotion or transfer into a Safety-Sensitive Position, and (iii) to Employees who have been approved for reinstatement into a Safety-Sensitive Position. The certification process will require any such individual to successfully pass an Alcohol and Drug test.

EXCEPTIONS

Intentionally left blank.

DEFINITIONS

All undefined capitalized terms in this Standard are as defined in the Alcohol and Drug Policy.

REFERENCES TO RELATED DOCUMENTS

Alcohol and Drug Policy
Medication Standard
Social and Business Hosting Standard
Substance Abuse Assessment Standard